

MATTHEW J. PLATKIN
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The College of New Jersey*

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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
VICINAGE OF TRENTON

NONNA Y. SOROKINA,	:
	: HON. FREDA F. WOLFSON, U.S.D.J.
	: HON. DOUGLAS E. ARPERT, U.S.M.J.
Plaintiff,	:
	: CIVIL ACTION NO. 3:19-cv-20674
v.	:
	:
THE COLLEGE OF NEW JERSEY,	:
	:
Defendant.	:
	:

TO: Clerk of the Court

Sergey Joseph Litvak, Esq.
Litvak Legal Group, P.L.L.C.
3070 Bristol Pike, Ste. 1-204
Bensalem, Pennsylvania 19020

PLEASE TAKE NOTICE that on Friday, **February 21, 2023**, or on
such other date as may please the Court, Matthew J. Platkin,

Attorney General of New Jersey, by Deputy Attorneys General John P. Cascio and Thomas W. Carter, appearing on behalf of the Defendant, The College of New Jersey (hereinafter "TCNJ"), will apply to the United States District Court for the District of New Jersey, at the Courthouse located in Trenton, New Jersey, for an Order both (1) granting TCNJ's Motion for Summary Judgment, with prejudice, in its entirety; and (2) dismissing each and every one of Plaintiff's claims, with prejudice, in its entirety, all pursuant to Fed. R. Civ. P. 56.

PLEASE TAKE FURTHER NOTICE that it is requested that the Court consider this motion on the papers submitted unless opposition is entered, in which case oral argument is requested.

In support of its motion, TCNJ will rely upon the attached Brief, Statement of Material Facts, and attached exhibits.

A proposed form of Order is attached.

Discovery End Date: June 1, 2022

Arbitration Date: N/A

Trial Date: N/A

MATTHEW J. PLATKIN
ATTORNEY GENERAL OF NEW JERSEY

By: /s/ John P. Cascio
John P. Cascio, Deputy Attorney General
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By: /s/ Thomas W. Carter
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DATED: January 17, 2023